

DANIELLE K. LEWIS (SBN 218274)  
dlewis@hpylaw.com  
MILES F. MAURINO (SBN 319377)  
mmaurino@hpylaw.com  
HAWKINS PARNELL & YOUNG LLP  
33 New Montgomery, Suite 800  
San Francisco, CA 94105-4537  
Telephone: 415.766.3200  
Facsimile: 415.766.3250

Attorneys for Defendants  
COUNTY OF SOLANO (erroneously sued as SOLANO  
COUNTY SHERIFF'S OFFICE), SHERIFF THOMAS  
A. FERRARA, DALTON MCCAMPBELL, LISA  
MCDOWELL, ROY STOCKTON, CONNOR  
HAMILTON, and CHRIS CARTER

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

NAKIA V. PORTER, an individual on her  
own behalf and on behalf of her minor  
children, L.P. and A.P.; JOE BERRY  
POWELL, JR., an individual; and CLIFTON  
POWELL, on behalf of his minor child, O.P.,

Plaintiffs,

v.

COUNTY OF SOLANO; SOLANO  
COUNTY SHERIFF'S OFFICE; SHERIFF  
THOMAS A. FERRARA, in his official  
capacity as Sheriff of Solano County;  
DEPUTY DALTON MCCAMPBELL, an  
individual; DEPUTY LISA MCDOWELL, an  
individual; SERGEANT ROY STOCKTON,  
an individual; DEPUTY CONNOR  
HAMILTON, an individual; DEPUTY CHRIS  
CARTER, an individual; CITY OF DIXON;  
DIXON POLICE DEPARTMENT; DIXON  
POLICE CHIEF ROBERT THOMPSON, in  
his official capacity as Dixon Chief of Police;  
OFFICER GABRIEL HOLLINGHEAD, an  
individual, OFFICER AARON WILLIAMS,  
an individual, and DOES 1 to 10, inclusive,

Defendants.

Case No. 2:21-cv-01473-KJM-JDP

**STIPULATION AND ORDER FOR  
PSYCHIATRIC EXAMINATION OF  
PLAINTIFF JOE BERRY POWELL, JR.**

Judge: Hon. Kimberly J. Mueller

It is hereby stipulated by and between Plaintiffs Nakia Porter, Joe Berry Powell, Jr. and minors A.P., L.P., and O.P., and Defendants County of Solano, Sheriff Thomas A. Ferrara, Dalton McCampbell, Lisa McDowell, Roy Stockton, Connor Hamilton and Chris Carter (“Solano County Defendants”) through their counsel of record, as follows:

1. Plaintiff Joe Berry Powell, Jr. will appear for a mental examination pursuant to Federal Rule of Civil Procedure 35, to be conducted by Dr. Alexandra Clarfield, Ph.D. a licensed clinical psychologist (California License Number 25459) on February 21, 2024 at 10:00 a.m., which will be conducted at 1223 High Street, Suite C-1, Auburn, California 95603.

2. The examination is expected to last approximately four hours. Plaintiff Joe Berry Powell, Jr. will be permitted periodic breaks during the examination. Plaintiff Joe Berry Powell, Jr. will also be permitted time for a lunch break. Time used for breaks is not included in calculating the time for the examination.

3. The examination will consist of a clinical interview by Dr. Clarfield, and an administration of standard psychological tests. The psychological testing may include the following: MMPI-2; Rorschach; Clinical Administered PTSD Scale; Beck Depression Inventory; Wexler Memory Scale; Inventory of Problems (IOP) 29. Dr. Clarfield may administer additional tests if the need for them is suggested by her interview with Plaintiff Joe Berry Powell, Jr. However, if any such additional tests are administered, they will not add to the length of the examination and will be standardized, accepted tests. In advance of the examination, Plaintiff Joe Berry Powell, Jr. will be provided with an intake form, which he will complete and provide in advance of the examination.

4. No third party(ies), including but not limited to the parties' attorneys of record, will be permitted to present during any portion of the examination.

5. This stipulation will not be deemed to incorporate all of the provisions of Rule 35; specifically, it does not include the rules for exchange of medical or psychological reports and waiver of privilege.

6. The examination will not be recorded by audio or video.

DATED: February 9, 2024

By: /s/ Yasin M. Almadani\*

YASIN M. ALMADANI  
AHMED IBRAHIM  
Attorneys for Plaintiffs  
NAKIA PORTER, JOSEPH BERRY  
POWELL, minors L.P., A.P., and O.P.

DATED: February 9, 2024

HAWKINS PARNELL & YOUNG LLP

By: /s/ Danielle K. Lewis

DANIELLE K. LEWIS  
MILES F. MAURINO  
Attorneys for Defendants  
COUNTY OF SOLANO (erroneously sued  
as SOLANO COUNTY SHERIFF'S  
OFFICE), SHERIFF THOMAS A.  
FERRARA, DALTON MCCAMPBELL,  
LISA MCDOWELL, ROY STOCKTON,  
CONNOR HAMILTON, and CHRIS  
CARTER

\* I have authorization from the above-  
named counsel to e-file this document.

**ORDER**

The parties having stipulated thereto, **IT IS SO ORDERED.**

Dated: February 16, 2024.

  
\_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE